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Attorney for Applicant
Seyeon In

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re Ex Parte Application of)
Seyeon In,) Case Number:
Applicant.) **DECLARATION OF SEYEON IN IN**
) **SUPPORT OF SEYEON IN'S *EX PARTE***
) **APPLICATION FOR ORDER PURSUANT**
) **TO 28 U.S.C. § 1782 AUTHORIZING**
) **DISCOVERY FOR USE IN FOREIGN**
) **PROCEEDINGS**

I, Seyeon In, declare that:

1. I am more than 21 years of age, am competent to testify on the matters stated in this declaration, and, except as may be otherwise stated in this declaration, have personal knowledge of the matters stated in this declaration.

2. I am an influencer and a streamer on YouTube, Instagram, and AfreecaTV, and my address is located in Seoul, Republic of Korea.

3. This declaration is in support of my *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Authorizing Discovery for Use in Foreign Proceedings.

4. AfreecaTV is a Korean internet broadcasting platform for streamers.

5. As an influencer and streamer, my nickname is Juice Seyeon.

6. An anonymous individual (hereinafter "**Anonymous Individual**") owns two YouTube channels.

7. The first YouTube channel is named “*Gochubat*” (“고추밭” in the original Korean language) (hereinafter “**YouTube Channel 1**”) located at <https://www.youtube.com/@gochubat2024>.

8. The second YouTube channel is named “*Serengeti*” (“세렝게티” in the original Korean language) (hereinafter “**YouTube Channel 2**”) located at <https://www.youtube.com/@%EC%84%B8%EB%A0%9D%EA%B2%8C%ED%8B%B0>.

9. Both YouTube Channel 1 and YouTube Channel 2 published the same YouTube video (hereinafter “**Video**”) in which the Anonymous Individual defamed me through falsities.

10. The Anonymous Individual uploaded the Video on YouTube Channel 1 on August 10, 2024 at https://www.youtube.com/watch?v=WX97f1RZ_8A.

11. The Anonymous Individual uploaded the Video on YouTube Channel 2 on August 19, 2024 at <https://www.youtube.com/watch?v=aLHJPrbYyr8>.

12. In the Video title, the Anonymous Individual states that I traveled to Las Vegas with Bang Si-hyuk, which is plainly false.

13. In the Video, between 1:18 and 1:34, the Anonymous Individual states “As for Juicy Seyeon’s family, given its short infranasal depression, their life expectancy is unlikely to be significant. So it seems befitting that they would focus on enjoying fucking life in short term without giving it a second thought”, which is stated after the Anonymous Individual discusses how my sister that appears in the photograph at issue looks like BJ Moore, who he describes as being a “Cyber Changnyeo”.

14. “Changnyeo” in the Korean language means a prostitute, and “Cyber Changnyeo” means a prostitute that does various sexual acts online and is often abbreviated to “SaChang.”

15. When read in conjunction with the title of the Video, the above statement would be understood by an ordinary viewer as implying that I had a sexual relationship with the male individual that is discussed in the Video, Bang Si-hyuk, in exchange for money because I am a prostitute; this is simply and maliciously false, as I have never had any intimate or sexual relationship with Bang Si-hyuk, I have never had a sexual relationship with anyone in exchange for money, and I am not a prostitute.

1 16. In the Video between 1:35 and 2:00, the Anonymous Individual states "... HYBE
2 became the hot topic for gossip because its chairman was known for messing around with Cyber
3 Changnyeos" and between 2:01 and 2:19, the Anonymous Individual states "If we look at chairman
4 Bang Si-hyuk's romantic trip with SaChangs to Las Vegas, which was a complete success"; these
5 statements means that the Chairman of HYBE, Bang Si-hyuk, is known for messing around with
6 Cyber Changnyeos (online prostitutes), and he had a romantic trip with SaChangs to Las Vegas.

7 17. "SaChangs" in the Korean language means "fleshpots", and is understood to mean
8 places or people that supply sexual entertainment.

9 18. In the Video between 2:43 and 3:04, the Anonymous Individual states "And Juicy
10 Seyeon, having stacked all that money, went on a joy trip with the Chairman of HYBE taking her
11 sister to Las Vegas, bathing in dopamine in California"; this statement falsely accuses me of
12 receiving money from the head of my fan club, having a sexual relationship with Bang Si-hyuk,
13 and being taken to Las Vegas and California by Bang Si-hyuk with my sister.

14 19. In the Video between 3:59 and 5:11 and between 6:18 and 6:39, the Anonymous
15 Individual falsely explains how Bang Si-hyuk was with me and my sister in Las Vegas, how he
16 was paying for me and my sister's visit to Las Vegas, and why he got me a room at the Bellagio
17 Hotel, which statements are all complete baseless lies; I have never traveled to Las Vegas with
18 Bang Si-hyuk, Bang Si-hyuk did not pay for my trip to Las Vegas, and Bang Si-hyuk never got
19 me a room at the Bellagio Hotel.

20 20. In the Video between 5:12 and 5:21 and between 5:48 and 5:54, the Anonymous
21 Individual falsely states that I am a "Cyber Changnyeo", or an online prostitute; I have never
22 engaged in prostitution, I have never received money in exchange for sex, and being accused of
23 engaging in prostitution is extremely defamatory and damaging to my reputation.

24 21. In the Video between 5:22 and 5:34, the Anonymous Individual falsely accuses me
25 of dating Bang Si-hyuk.

26 22. In the Video between 5:35 and 5:47, the Anonymous Individual falsely accuses me
27 of receiving compensation in exchange for having sex with Bang Si-hyuk; I have never had any
28 sexual relationship with Bang Si-hyuk, and I have never received any money in exchange for sex.

1 23. The repercussions of the defamatory statements contained in the Video are
2 significant, and at a minimum, recently, a video that was to be released on a YouTube channel in
3 which I was to appear was cancelled because of the Video.

4 24. I have also lost many business opportunities and appearances because of the
5 falsities being stated in the Video, as broadcasters and other companies do not want to do business
6 with someone whose reputation has been tainted by such alleged sexual conduct and who is being
7 accused of being a prostitute and a fleshpot.

8 25. I have been mentally and psychologically harmed by the Video, I have been
9 humiliated by the Video, I am feeling extreme stress and suffering from insomnia because of the
10 Video, and I feel powerless that I cannot do anything about the falsities contained in the Video.

11 26. I have filed a civil lawsuit on September 6, 2024 against the Anonymous Individual
12 in the Seoul Central District Court in the Republic of Korea, Civil Case Number
13 2024Gadan5381770, for defamation (hereinafter “**Civil Case**”).

14 27. I have thoroughly reviewed the information on the YouTube Channel to find
15 information that may lead to the true identity of the Anonymous Individual, but I was unable to
16 find any identifying information that will reveal the true identity of the Anonymous Individual.

17 28. I have also searched online to find information that may lead to the true identity of
18 the Anonymous Individual, but I was unable to find any identifying information that may lead to
19 the true identity of the Anonymous Individual.

20 29. I have been unable to identify the true identity of the Anonymous Individual,
21 preventing me from proceeding with the Civil Case against the Anonymous Individual.

22 30. Unless the true identity of the Anonymous Individual is revealed, I will be unable
23 to pursue the Civil Case against the Anonymous Individual.

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